

Titus, Jonathan
Page 1 of 1

618 W Placita de la Poza
Tucson, AZ 85704
520-877-8447
October 4, 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

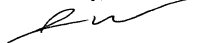
This letter is in regard to the "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS". I am very opposed to the construction of this power line.

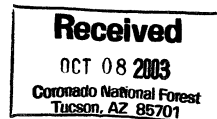
1 As you know, the Tumacacori and Atascosi Mountains are exceptional areas and the
powerline is incompatible with the natural characteristics of these two mountain ranges. I
2 enjoy walking, botanizing and birding in the area that will be impacted by the powerline
in either the Western or Crossover Routes. In addition to the powerline itself, TEP
proposes the construction of a lot of new roads. There's already too many roads in this
area. We don't need any more roads in our natural areas.

1 The Tumacacori Highlands Proposed Wilderness is a wonderful area of scenic beauty,
cont. endangered species and plant communities that are now very rare. If the powerline and
2 associated roads are constructed they will be corridor for the spread of invasive species (a
3 major problem in Coronado National Forest) into the area and into the nearby Pajarita
Wilderness Area, Gooding RNA, and Sycamore Canyon. Powerline corridors also
disrupt wildlife movements and are conduits for ORV's and smugglers.

1 Please deny the special use permits for the Western and Crossover Routes! These
cont. powerline routes are not compatible with the current uses of the affected area.
Remember that a Forest Plan Amendment would only decrease the dwindling supply of
remote recreational experiences in the region and would negatively impact many
sensitive wildlife and plant species that are an important aspect of our southern Arizona
Natural Heritage. Thank you.

Sincerely,


Jonathan Titus



Comment No. 1

Sections 3.1 and 4.1 present a description of the existing land use and analyze the potential impacts to these resources from the proposed project, including potential impacts to Tumacacori and Atascosa Mountains.

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to the proposed project.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to endangered species.

Comment No. 2

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Forest as a whole, not for individual land units or EMAs within the Coronado National Forest.

Section 4.3.2, Biological Resources, states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances. Sections 3.3.3 and 4.3.3 presents analyses of the existing special interest species, and potential impacts to these species as a result of the proposed project. Section 3.3.2 discusses the existing vegetation and wildlife in the proposed project area, and Section 4.3 analyzes habitat fragmentation impacts. Sections 3.3.6 and 4.3.6 discuss the existing invasive species (nonnative plants) in the project area, and potential invasive species impacts that could result from the proposed project.

Comment No. 3

Sections 3.3.1 and 4.3.1 of the Final EIS have been revised to include the additional information regarding habitat fragmentation, specifically with respect to roads and linear corridors such as those associated with the proposed project.

Comment No. 3 (continued)

Section 3.1.2 states that there is off-highway (off-road) vehicle use in the project area, and Section 4.1.2 analyzes the impacts of off-highway vehicle use as one of many recreational uses of the project area, including the Coronado National Forest.

The Federal agencies have revised Sections 4.1.1, Land Use; Section 4.12, Transportation; and Chapter 5, Cumulative Impacts of the Final EIS based on the U.S. Border Patrol's response (USBP 2004) to the Federal agencies' request regarding illegal immigration and law enforcement activities in the proposed project vicinity. The U.S. Border Patrol's response generally reinforced the information on which the relevant analysis in the Draft EIS was based. The U.S. Border Patrol stated that the roads associated with the construction and maintenance of the proposed project would contribute to an increase in illegal immigrant and narcotic smugglers in the area and affect U.S. Border Patrol operations. The effects of these activities are reflected in the Final EIS in the sections listed above.

Truschel, Ann-Louise
Page 1 of 1

Ann-Louise Truschel
1213 South Johnson Road
Buckeye, AZ 85326

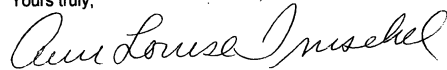
Acting Supervisor
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

RE: Tucson Electric Power (TEP) Company Sahuarita-Nogales Transmission Line
Draft Environmental Impact Statement (DEIS)

Dear Sir or Madam:

- 1 I am writing to urge you to withdraw the current draft Environmental Impact Statement for Tucson Electric Power's proposed 345 kV powerline.
- 2 TEP's proposed "Western Route" and "Crossover Route" for this unnecessary project would carve through some of the most remote and wild areas in all of Southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori Mountains and Atascosa highlands.
- 3 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to serve Nogales, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline which would primarily serve Mexico.
- 4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require massive increases to consumers' electricity bills.
- 5 The recent massive blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully explores all options (including a local power plant and smaller power lines which would not serve Mexico) which would meet the important public interest of providing reliable energy service to Santa Cruz County.

Yours truly,


Ann-Louise Truschel

Comment No. 1

The Federal agencies note the commentor's suggestion that DOE withdraw the current Draft EIS.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit.

Comment No. 4 (continued)

The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Turner, Dale S.
Page 1 of 2

Dale Turner	520-792-2690	10/13/03	10:09 PM	2/3
<p>October 13, 2003 315 E. Elm Street Tucson, AZ 85705 (520) 792-2690 dturner@theriver.com</p>				
<p>Sue Kozacek Acting Forest Supervisor Coronado National Forest 300 W. Congress Tucson, AZ 85701</p>				
<p>Re: Sahuarita-Nogales Transmission Line DEIS</p>				
<p>Dear Supervisor Kozacek:</p>				
1	<p>I am very concerned about the Sahuarita-Nogales Transmission Line proposed by Tucson Electric Power, as described in their Draft Environmental Impact Statement. The two alternatives considered in detail, the Western and Crossover Routes, would both cause significant short- and long-term degradation to one of the most biologically important areas in the Southwest.</p>			
2	<p>I am a biologist who has conducted field surveys in the Peck Canyon area, and have extensive knowledge of the region's biological richness. The Tumacacori/Atascosa Mountain complex is renowned for its high species diversity and its ecological intactness. I firmly believe those qualities will be jeopardized by powerline construction and maintenance along either of those proposed routes. The threats include:</p>			
3	<ul style="list-style-type: none"> Invasive species. New construction, new roads, improvement of existing roads, and increased vehicle traffic are all major risk factors for the spread of exotic plant seeds and pathogenic microorganisms. Once established, those invasives will be impossible to remove from the system, and may have severe effects on native plant and animal species. This is of particular concern in the Sycamore Canyon watershed, as that canyon is critical to several aquatic species of great concern. 			
4	<ul style="list-style-type: none"> Sediment in streams. Road and powerline construction will inevitably result in increased sediment loads in the stream channels below them, causing significant impacts to Sycamore or Peck Canyons and the biota which depend on them. 			
5	<ul style="list-style-type: none"> Illegal immigrant traffic. Construction and maintenance of a powerline will provide new routes for illegal immigrants, with associated vehicle impacts from those who drive and trash piles from those who walk. The increase in people transporting drugs along that route will substantially increase the existing threat to public safety. They will inevitably be followed by Border Patrol vehicles, which will extend vehicle impacts far beyond constructed roadways. 			
6	<ul style="list-style-type: none"> Constraints on fire. Part of maintaining a healthy ecosystem in this area is regular disturbance by fire, and powerlines will place new constraints on fire management. The roadways used for construction and maintenance will form new fire breaks, reducing the spread of naturally-ignited fires. The presence of powerlines will complicate plans for prescribed fires, affecting both ignition and suppression actions. 			

Comment No. 1

Chapter 3 describes the affected environment, and Chapter 4 analyzes the potential impacts to the environment from the proposed project, including potential impacts to biological resources (Sections 3.3 and 4.3).

Comment No. 2

Section 3.3 presents a description of the existing biological resources and Section 4.3 analyzes the potential impacts to these resources, including potential impacts to species within the Tumacacori and Atascosa Mountains.

Comment No. 3

Section 4.3.2, Biological Resources, states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances. Sections 3.3.3 and 4.3.3 presents analyses of the existing special interest species, and potential impacts to these species as a result of the proposed project. Section 3.3.2 discusses the existing vegetation and wildlife in the proposed project area, and Section 4.3 analyzes habitat fragmentation impacts. Sections 3.3.6 and 4.3.6 discuss the existing invasive species (nonnative plants) in the project area, and potential invasive species impacts that could result from the proposed project.

Comment No. 4

Refer to Section 4.7, Water Resources, for a discussion of erosion and sedimentation.

Comment No. 5

Section 4.12, Transportation, of the Final EIS has been revised to include the commentor's statement that illegal immigrants leave trash and waste behind as they pass through an area. The transmission line ROW and access roads would not provide a single continuous pathway from the U.S.-Mexico border.

Turner, Dale S.
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Dale Turner	520-792-2690	10/13/03	10:09 PM	3/3
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7 • Fragmentation of habitat. New or expanded roads will fragment the available habitat for many organisms. There is a large body of scientific literature showing negative effects of roads as barriers to dispersal of plants, small animals, and even some large mammals.

8 I believe these environmental effects were not adequately addressed in the DEIS, and should be sufficient grounds to reject this proposal. Beyond that, the presence of an easier route along I-19 with minimal new environmental impacts suggests that there is no justification for approving this proposal. I urge you to deny the special use permit for the Western and Crossover Routes, and to avoid a Forest Plan amendment which might

9 facilitate construction along those routes.

Yours,



Dale S. Turner

Comment No. 5 (continued)

The Federal agencies have revised Sections 4.1.1, Land Use; Section 4.12, Transportation; and Chapter 5, Cumulative Impacts of the Final EIS based on the U.S. Border Patrol's response (USBP 2004) to the Federal agencies' request regarding illegal immigration and law enforcement activities in the proposed project vicinity. The U.S. Border Patrol's response generally re-enforced the information on which the relevant analysis in the Draft EIS was based. The U.S. Border Patrol stated that the roads associated with the construction and maintenance of the proposed project would contribute to an increase in illegal immigrant and narcotic smugglers in the area and affect U.S. Border Patrol operations. The effects of these activities are reflected in the Final EIS in the sections listed above

Comment No. 6

Section 4.1.1 of the Final EIS has been revised to discuss fires in the CNF. As discussed in that section, the presence of transmission lines in the CNF is not expected to result in any significant impacts related to fires, or introduce any significant constraints on the ability of the USFS to maintain a healthy forest.

Comment No. 7

Sections 3.3.2 and 4.3.2 of the Final EIS have been revised to address habitat fragmentation.

Comment No. 8

The commentor's suggestion of building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5).

Comment No. 9

The Federal agencies note the commentor's opposition to a special use permit for the Western and Crossover Corridors and a Forest Plan amendment.

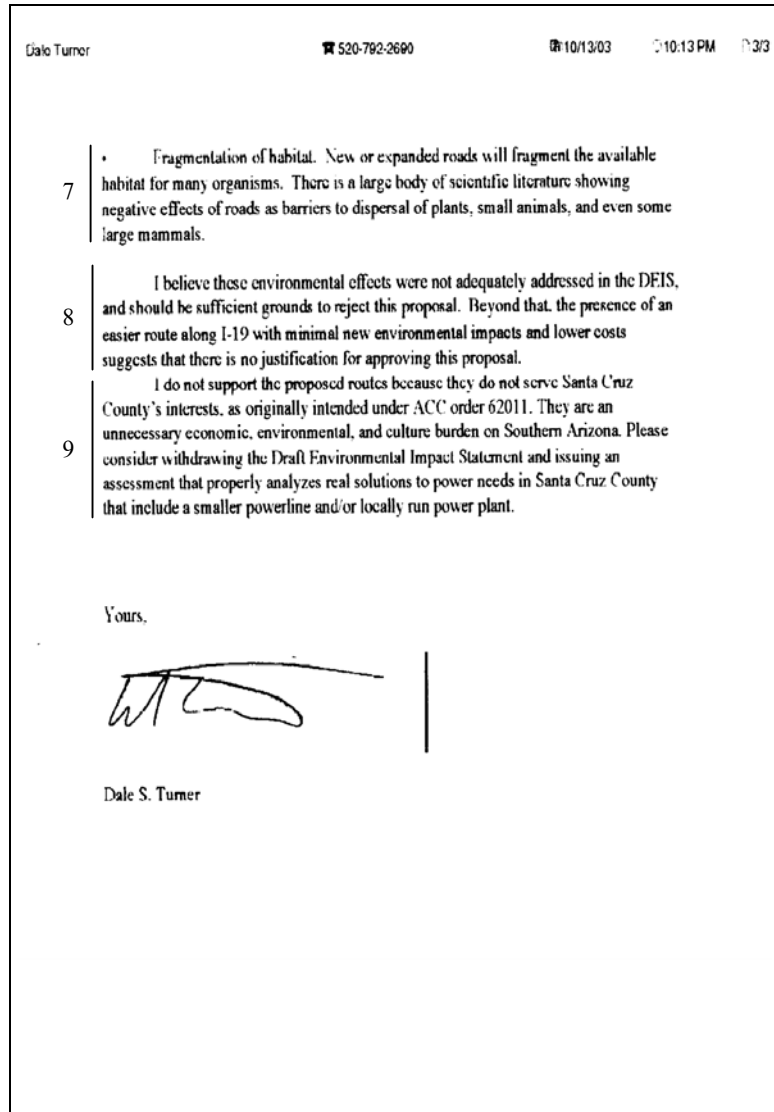
Turner, Dale S.
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Comment Nos. 1-8

Refer to the responses to Comments 1-8, respectively, in the previous submittal from Dale S. Turner.

Dale Turner		520 792 2690		10/13/03		10:12 PM		2/3	
				October 13, 2003		315 E. Elm Street		Tucson, AZ 85705	
				(520) 792-2690		dtturner@theriver.com			
				Dr. Jerry Pell		Office of Fossil Energy		U.S. Department of Energy	
				Washington D.C. 20585					
				Re: Sahuarita-Nogales Transmission Line DEIS					
				Dear Dr. Pell:					
1	I am very concerned about the Sahuarita-Nogales Transmission Line proposed by Tucson Electric Power, as described in their Draft Environmental Impact Statement. The two alternatives considered in detail, the Western and Crossover Routes, would both cause significant short- and long-term degradation to one of the most biologically important areas in the Southwest.								
2	I am a biologist who has conducted field surveys in the Peek Canyon area, and have extensive knowledge of the region's biological richness. The Tumacacori-Atascosa Mountain complex is renowned for its high species diversity and its ecological intactness. I firmly believe those qualities will be jeopardized by powerline construction and maintenance along either of those proposed routes. The threats include:								
3	<ul style="list-style-type: none"> * Invasive species. New construction, new roads, improvement of existing roads, and increased vehicle traffic are all major risk factors for the spread of exotic plant seeds and pathogenic microorganisms. Once established, those invasives will be impossible to remove from the system, and may have severe effects on native plant and animal species. This is of particular concern in the Sycamore Canyon watershed, as that canyon is critical to several aquatic species of great concern. 								
4	<ul style="list-style-type: none"> * Sediment in streams. Road and powerline construction will inevitably result in increased sediment loads in the stream channels below them, causing significant impacts to Sycamore or Peek Canyons and the biota which depend on them. 								
5	<ul style="list-style-type: none"> * Illegal immigrant traffic. Construction and maintenance of a powerline will provide new routes for illegal immigrants, with associated vehicle impacts from those who drive and trash piles from those who walk. The increase in people transporting drugs along that route will substantially increase the existing threat to public safety. They will inevitably be followed by Border Patrol vehicles, which will extend vehicle impacts far beyond constructed roadways. 								
6	<ul style="list-style-type: none"> * Constraints on fire. Part of maintaining a healthy ecosystem in this area is regular disturbance by fire, and powerlines will place new constraints on fire management. The roadways used for construction and maintenance will form new fire breaks, reducing the spread of naturally-ignited fires. The presence of powerlines will complicate plans for prescribed fires, affecting both ignition and suppression actions. 								

Turner, Dale S.
Page 2 of 2



Comment No. 9

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Van Deven, Bob
Page 1 of 1

Comment No.1

The Federal agencies note the commentator's opposition to the proposed project.

From: Bob Van Deven [SMTP:bobvandeven@hotmail.com]
To: Pell, Jerry
Cc:
Subject: Proposed power line
Sent: 9/2/2003 8:18 PM
Importance: Normal

Dear Mr. Pell,

1 | For the life of me I cannot understand why TEP deems it necessary to string yet another power line through yet another roadless area. When I first considered expressing my opinion I figured I would include all the logical reasons why such a power line would be a bad idea: ruining the pristine beauty of the Tumacacori/Atascosa mountains, damaging fragile habitat, etc. But now I have a better idea.

I am extending a challenge to all who might be in favor of the proposed power line route. I hereby challenge all those persons to get in their cars, drive to the Atascosa Lookout trailhead on Ruby road (about 50 miles south of Tucson and 15 miles west of I-19; get a map), hike the 2.5 mile trail to the long-abandoned lookout, and ACTUALLY SEE the land across which those ugly poles and high-tension lines would be strung. Anyone who can look out on that gorgeous country and honestly say that bulldozing a road across it would be a fair price to pay for a few extra watts of power in Santa Cruz county and Mexico is welcome to their opinion—but only after they see.

Sincerely,

Bob Van Deven
332 E. 5th St.
Tucson, AZ 85705
bobvandeven@hotmail.com

Van Deven, Bob
Page 1 of 1

September 25, 2003

Dr. Jerry Pell
Office of Fossil Energy
U.S. Department of Energy
Washington D.C. 20585


Dear Dr. Pell

1 I am writing to urge you to withdraw the current draft EIS for Tucson Electric Power's proposed 345 kV power line. TEP's proposed "Western Route" and "Crossover Route" for this unnecessary project would carve through some of the most remote and wild areas in all of southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori and Atascosa highlands.

2 The important goal of providing reliable electric service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to serve the area, TEP has proposed a massive, environmentally destructive, and extremely controversial power line which would primarily serve Mexico. The draft EIS is
3 inadequate because it does not address important alternatives to TEP's power line which could provide reliable service without destroying our public lands and which would not require large increases to consumers' electricity bills.

4 I urge the DOE to issue a new draft EIS which fully explores all options, including a local power plant and smaller power lines which would not serve Mexico. Santa Cruz County's electricity needs should be met, but not at the expense of our environmental and cultural heritage.

Sincerely,


Bob Van Deven
332 E. 5th St.
Tucson, AZ 85705
(520) 850-7706
bobvandeven@hotmail.com

Comment No. 1

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Comment No. 2

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 3

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's

Comment No. 3 (continued)

business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 4

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Van Deven, Bob
Page 1 of 1

September 25, 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Re: Tucson Electric Power Sahuarita-Nogales Transmission line DEIS and needed Forest Plan Amendments

Dear Supervisor Kozacek,

1 For the last 13 years I have greatly enjoyed birdwatching, photography, hiking, and camping in the Atascosa and Tumacacori Mountains. I was very disappointed to learn of Tucson Electric Power's proposal to build over 20 miles of new roads through this area to support the construction of (yet another) massive power line. As you know, the road density in that area is already above acceptable limits set forth in the current Forest Plan. Although TEP has proposed to close an equivalent length of "wildcat" roads in the area, I fail to see how this will mitigate the impact of 20 continuous miles and the dominating presence of steel towers and high tension power lines. As a photographer I can tell you that southern Arizona has more than enough of these unsightly monsters crisscrossing the landscape; composing a shot in which one does not show up in the viewfinder has become nearly impossible.

3 I urge you to oppose any Forest Plan Amendment that would permit the construction of this power line. Surely there must be another way to deliver reliable electric power to Santa Cruz county.

Sincerely,


Bob Van Deven
332 E. 5th St.
Tucson, AZ 85705
(520) 850-7706
bobvanden@hotmail.com

Comment No. 1

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. Any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate. Based on these terms and conditions for ensuring the effectiveness of road closures, the proposed project is consistent with Forest Plan standards and guidelines for road density.

Comment No. 2

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

Comment No. 3

The Federal agencies note the commentator's opposition to the Forest Plan amendment.

Vandeman, Mike
Page 1 of 2

----- Forwarded by Susan K Kozacek/R3/USDAFS on
10/09/2003 06:51 PM -----
mjvande@pacbell.net
10/09/2003 04:50 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori
Highlands. This area contains several roadless areas as well
as a citizen's proposed Wilderness area home to black bears,
Mexican spotted owls, lesser-long nosed bats and peregrine
falcons as well as lesser known species such as the Sonora
chub, Mexican vine snake, elegant trogon and the Gentry
indigo bush. A jaguar was sighted in this area only two
years ago.

Comment No. 1

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Vandeman, Mike
Page 2 of 2

3 | The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

4 | The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5 | The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

6 | Wildlife MUST be given top priority, because they cannot protect themselves from us.

Sincerely,
Mike Vandeman

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Comment No. 6

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project.

Vollmar, Warren and Ann
Page 1 of 1

Dr. Jerry Pell
Office of Fossil Energy
US Dept. of Energy
Washington, D.C. 20585

Sept. 30, 2003

Dear Dr. Pell,

This letter is in reference to the Tuscon Electric Power Sahuarita-Nogales Transmission line DEIS. My wife and I are winter visitors to the Arivaca area and we do much hiking, birding and mountain biking in the area. We were dismayed to hear of the plans for this power line. Why isn't a less obtrusive powerline being considered? We don't believe there is a need for this huge line through this environmentally sensitive area. It would certainly be an eyesore and an unnecessary economic and environmental burden on this beautiful area of Southern Arizona.

- 1
 - 2
- Please consider withdrawing this DEIS and issuing a new assessment that properly analyzes real solutions to power needs in Santa Cruz Count and includes a smaller powerline and/or locally run power plant.

Thank you for your consideration.

Sincerely,

Ann E. Vollmar

Warren

Warren & Ann Vollmar
94970 Little Muskrat
Cook, MN 55723
vollmars@uslink.net
218-753-8007

Comment No. 1

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

Comment No. 2

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the

Comment No. 2 (*continued*)

proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Weaver, Craig
Page 1 of 2

TEP Sahuarita-Nogales Transmission line DEIS (letter #2)

From: craig weaver [SMTP:craig@cybervault.com]
To: Pell, Jerry
Cc:

Subject: TEP Sahuarita-Nogales Transmission line DEIS
(letter #2)
Sent: 10/14/2003 8:40 PM
Importance: Normal
October 14, 2003

Dr. Jerry Pell
Office of Fossil Energy
U.S. Department of Energy
Washington D.C. 20585

RE: Tucson Electric Power Sahuarita-Nogales Transmission
line DEIS

Dear Dr. Pell,

1 | I'm writing to object to the plan by Tucson Electric and
| zower to construct the Sahuarita-Nogales Transmission
| Line.

Having lived near the Palo Verde Nuclear Generating
Station in Wintersburg Arizona I've seen the results of
power lines crossing wild lands. Problems like habitat
fragmentation and roads that are built during power pole
construction and are never abandoned or reclaimed plus the
destruction of the visual landscape that makes the
southwest so unique are a few of the issues I've witnessed.

2 | In this case of this application, I believe the favored

Comment No. 1

The Federal agencies note the commentator's opposition to the proposed project.

Comment No. 2

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

Likewise, Sections 3.3 and 4.3 present a description of existing biological resources and analyze the potential impacts to these resources from the proposed project.

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Comment No. 3

Refer to the response to Comment 2 above regarding the authority of the ACC.

Weaver, Craig
Page 2 of 2

2 | alternative (#2 Western) along with the other alternatives
 cont. | (#3-#4) would have severe long-term negative effects to
 | wildlife and scenery. My familiarity with this spectacular
 | region in Southern Arizona make me feel that the impacts
 | I've seen occur with other similar power lines far outweigh
 | the needs of Santa Cruz County in this case.

3 | A new power house (and associated power infracture) near
 | Bowie Arizona is more than adequate to insure that the
 | residents of Santa Cruz County have a reliable power
 | generation and delivery system. Also, other delivery options
 | exist which have not be reviewed. This proposed line is far
 4 | in excess of the needs of Santa Cruz County. I believe the
 | proposal you are reviewing is more about selling energy to
 | Mexico than meeting the needs of Arizonans.

5 | I favor the No Action alternative and feel other options for
 | meeting the energy needs of Santa Cruz County should be
 | reviewed before moving forward with this power line
 | project.

Sincerely,

Craig Weaver
 3601 N. 411 Ave
 Tonopah AZ 86354

P.S. Sir: To my embarrassment I inadvertently sent a
 previous version of this letter which was not spell
 checked.this one might be more understandable.I hope.
 Thanks C. Weaver.

Comment No. 4

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

Comment No. 5

Section 1.2 explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.